Statement to EPA Regarding the Pending Registration of Aldicarb 15GG for Use in Florida and Texas on Oranges and Grapefruit

Debra Rate's October 5, 2020 email to Ann Tillman of Pyxis, provided BEAD's percent crop treated figures for the use of aldicarb 15GG on domestic and imported oranges and orange juice. It is distressing and disconcerting to note that BEAD's percent crop treated figures for domestic oranges and juice are still greatly exaggerated and for imported oranges and juice they are obsolete and completely erroneous.

Since October 2017, AgLogic has consistently provided EPA with realistic percent crop treated values for oranges and grapefruit at least 15 times, dietary exposure and risk assessments at least 7 times, and information and documentation that aldicarb is not used on oranges and citrus in Mexico outside the US at least 10 times.

Additionally, AgLogic has voluntarily proposed capping the use of aldicarb 15GG on oranges and grapefruit to 100,000 acres. This acreage is well below the percent crop treated figure that could negatively impact the aldicarb dietary exposure and risk assessment, and definitively resolves EPA's model-based risk concerns.

Apparently with all the various other priorities at the Agency, BEAD and/or EPA's dietary exposure modelers have perhaps not received and reviewed the information AgLogic has submitted or, alternatively, have chosen to ignore it for unknown reasons. AgLogic has repeatedly requested a meeting with EPA/BEAD to discuss the percent crop treated figures for oranges and grapefruit but, to date, have not been successful. We need this meeting or call soon, so that both EPA and AgLogic are using the same assumptions for modeling and the dietary risk assessment can be completed before the December 14, 2020 PRIA date

AgLogic can briefly state its position on the three issues of concern as follows:

1. Our most recent position on **percent crop treated** for oranges and grapefruit has been carefully researched and calculated and is included in the report titled, *"Determination of Percent Orange and Grapefruit Acres Treated with AgLogic 15GG Aldicarb"*, dated February 11, 2020. This report, submitted to EPA on February 11, 2020, provides a detailed analysis of orange and grapefruit acres in the US and calculates the potential percent crop treated with aldicarb. The conclusion of this report states: *"After a review of recent acreage statistics for oranges and grapefruit, decades of historical use of aldicarb on citrus in Florida and Texas, the limited annual production capacity, and availability of AgLogic 15GG, the percent crop treated value should be revised from 65% on fresh oranges, 85% on juice oranges, and 90% on fresh and juice grapefruit, to 14.6% of the US orange and grapefruit acreage. This is a realistic, supportable, and conservative estimate for use in the aldicarb acute dietary exposure and risk assessment."*
2. AgLogic's position on **dietary exposure and risk** was most recently calculated and included in the report titled, *"Aldicarb. Updated Acute Aggregate Dietary (Food and Drinking Water) Exposure and Risk Assessments for Proposed Uses"*, dated February 12, 2019. This dietary exposure and risk assessment was conducted using the Dietary Exposure Evaluation Model software with the Food Commodity Intake Database (DEEM-FCID) Version 3.18. This risk assessment includes all registered crops, 21% of the US acres for orange and grapefruit, and drinking water. The most highly exposed sub-population was children age 1 to 2 years. This group was estimated to have a dietary exposure of 78.7 % of the aPAD at the 99.9th percentile of exposure. The next highest exposed population subgroup was children 3 to 5 years old that had estimated aldicarb exposures 59.7% of the aPAD. Estimated exposures in all other population subgroups remained well below 50% of the aPAD.

3. Our position on **aldicarb residues in imported agricultural commodities** was thoroughly discussed in our report titled, *"Aldicarb Is No Longer Used in Mexico"*, dated and submitted to EPA on September 14, 2018. This report, resubmitted to EPA September 11, 2020, clearly explains and documents that aldicarb is not registered or used on any crop in Mexico and, therefore, there are no aldicarb residues in oranges or juice imported from Mexico

BEAD should also consider the well documented benefits associated with the use of aldicarb on oranges and grapefruit. Aldicarb was registered for use on citrus between the 1978 and 2010. During this period aldicarb was widely recognized as the standard product for control of several important pests on citrus because it provided consistent control of nematodes, sucking insects, and mites. Additionally, aldicarb increased tree longevity, tree vigor, root growth, fruit yield and quality, and reduced the use of early season foliar sprays along with their associated risks. Prior to Bayer's voluntary cancellation of the use aldicarb on citrus in 2010, EPA stated *"There appear to be several alternatives to aldicarb for control of mites, but there appears to be no feasible alternative to aldicarb for nematode control"* (Kaul and Berwald, March 15, 2006). Numerous other documents from the 32-year period of aldicarb use on citrus elaborate on the numerous benefits of aldicarb and these documents are still relevant today.

Fibrous roots are critically important to nutrient uptake by citrus trees and both the number and quality of fibrous roots are significantly impacted and reduced by infestations of nematodes and citrus greening. During the 32 years of use, Florida citrus growers observed that when aldicarb was applied, citrus trees were more tolerant to infestations of nematodes, mites and insects and damage to the trees was significantly reduced. This was attributed to dramatically higher fibrous root growth and root health which increased foliage growth and tree vigor. This resulted in larger fruit, higher solids content, increased yield and fruit quality, and significantly increased income to growers.

According to university field studies conducted from about 1975-2000 the use of aldicarb on Florida oranges resulted in a net gain, excluding product and application cost, of approximately $857 per acre (based on 2020 dollars). This per acre increase in value is based on a $341 per acre increase in yield, a $416 per acre increase in solids, and a $100 per acre cost reduction from fewer early season sprays.

There is no other single product available to Florida and Texas citrus producers, which provides the spectrum of pest control and net economic benefits that is provided by AgLogic 15GG aldicarb pesticide. Testimonials, letters of support, and affidavits from researchers and growers attesting to this were first provided to EPA on July 2, 2018 and again on July 28, 2020.